July 7, 2023

GA Health Company Limited
Wing Yu Lam
Assistant Regulatory Affairs Manager
Unit 18, 21/F, Metropole Square, 2 On Yiu Street, Shatin
Hong Kong,
CHINA

Re: K230932
Trade/Device Name: ANDORATE® Valve Kit
Regulation Number: 21 CFR 876.1500
Regulation Name: Endoscope and accessories
Regulatory Class: Class II
Product Code: OCX, ODC
Dated: June 8, 2023
Received: June 8, 2023

Dear Wing Yu Lam:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. Although this letter refers to your product as a device, please be aware that some cleared products may instead be combination products. The 510(k) Premarket Notification Database located at https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm identifies combination product submissions. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any

Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803) for devices or postmarketing safety reporting (21 CFR 4, Subpart B) for combination products (see https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820) for devices or current good manufacturing practices (21 CFR 4, Subpart A) for combination products; and, if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to https://www.fda.gov/medical-devices/medical-device-safety/medical-device-reporting-mdr-how-report-medical-device-problems.

For comprehensive regulatory information about medical devices and radiation-emitting products, including information about labeling regulations, please see Device Advice (https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance) and CDRH Learn (https://www.fda.gov/training-and-continuing-education/cdrh-learn). Additionally, you may contact the Division of Industry and Consumer Education (DICE) to ask a question about a specific regulatory topic. See the DICE website (https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice) for more information or contact DICE by email (DICE@fda.hhs.gov) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

Shanil P. Haugen -S

Shanil P. Haugen, Ph.D.
Assistant Director
DHT3A: Division of Renal, Gastrointestinal, Obesity and Transplant Devices
OHT3: Office of GastroRenal, ObGyn, General Hospital and Urology Devices
Office of Product Evaluation and Quality
Center for Devices and Radiological Health

Enclosure

DEPARTMENT OF HEALTH AND HUMAN SERVICES
Food and Drug Administration

Indications for Use

Form Approved: OMB No. 0910-0120
Expiration Date: 06/30/2023
See PRA Statement below.

Submission Number *(if known)*

K230932

Device Name

ANDORATE® Valve Kit

Indications for Use *(Describe)*

The single use ANDORATE® Air/Water Valve is used to control the air / water function of an endoscope during GI endoscopic procedures.

The single use ANDORATE® Suction Valve is used to control the suction function of an endoscope during GI endoscopic procedures.

The single use ANDORATE® Biopsy Valve is used to cover the opening to the biopsy/suction channel of Olympus® gastro-intestinal endoscopes. The Biopsy Valve provides access for endoscopic device passage and exchange, helps maintain insufflation, minimizes leakage of biomaterial from the biopsy port through the endoscopic procedure and provides access for irrigation.

The single use ANDORATE® Auxiliary Water Connector is used in conjunction with irrigation tubing, intended to provide irrigation via irrigation fluids such as sterile water supplied to the Olympus® GI endoscope during gastrointestinal endoscopic procedures when used in conjunction with an irrigation pump. The Auxiliary Water Connector is manufactured with a one-way valve to minimize the risk of cross-contamination of the irrigation system.

Type of Use *(Select one or both, as applicable)*

☒ Prescription Use (Part 21 CFR 801 Subpart D) ☐ Over-The-Counter Use (21 CFR 801 Subpart C)

CONTINUE ON A SEPARATE PAGE IF NEEDED.

510(k) Summary

The 510(k) summary of safety and effectiveness information is being submitted in accordance with the requirements of the Safe Medical Devices Act of 1990 and 21 CFR 807.92.

1. Submission Sponsor

Submitter's Name:	GA Health Company Limited
Submitter's Address:	Unit 18, 21/F, Metropole Square 2 On Yiu Street, Shatin, N.T, Hong Kong, CHINA
Establishment Registration No.:	3014749926

2. Sponsor Contact

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3. Date Prepared

8 June 2023

4. Device Identification

Device Name:	ANDORATE® Valve Kit
Common Name:	Valve Kit for endoscope
Regulation Number:	21 CFR 876.1500
Regulation Name:	Endoscope and accessories
Product Code:	ODC, OCX
Product Code Name:	Endoscope Channel Accessory, Endoscopic Irrigation/Suction System
Regulation Class:	2
Device Panel:	Gastroenterology/Urology

5. Predicate Device Identification

Primary Predicate Device 510(k) No.:	K181509
Primary Predicate Device Trade Name:	Endorate Valve Sets
Primary Predicate Device Product Code:	ODC - Endoscope Channel Accessory
Secondary Predicate Device 510(k) No.:	K200481
Secondary Predicate Device Trade Name:	Biopsy Valve
Secondary Predicate Device Product Code:	ODC - Endoscope Channel Accessory
Secondary Predicate Device 510(k) No.:	K182998
Secondary Predicate Device Trade Name:	Andorate Auxiliary Water Connector
Secondary Predicate Device Product Code:	OCX - Endoscopic Irrigation/Suction System

6. Device Description:

The subject devices are intended for single use. Table 1 shows the components included in the submission.

Table 1 – Components included in the Submission

Components	Product Code	Regulation Number	Regulatory Classification
ANDORATE® Suction Valve	ODC – Endoscope channel accessory	21 CFR 876.1500	2
ANDORATE® Air/Water Valve	ODC – Endoscope channel accessory	21 CFR 876.1500	2
ANDORATE® Biopsy Valve	ODC – Endoscope channel accessory	21 CFR 876.1500	2
AQUAPULSE® Auxiliary Water Connector	ODC – Endoscope channel accessory	21 CFR 876.1500	2

The suction valve is designed to be attached to the suction port of the endoscope and the air/water valve is designed to be attached to the air/water port of the endoscope. The activation of the suction valve allows the user to aspirate excess fluids or other debris obscuring the endoscope image, while the activation of the air/water valve allows the user to control air and water flow to assist in cleansing the lens during procedures.

The biopsy valve is intended to cover the endoscope biopsy port during an endoscopy procedure. In addition, the valve provides access for endoscopic device passage and exchange, helps maintain insufflation and minimizes leakage of biomaterial from the biopsy port throughout the endoscopic procedure.

The auxiliary water connector is manufactured for use in conjunction with irrigation tubing, and Olympus endoscope. It is designed to be attached to the auxiliary water port of the endoscopes. The auxiliary water connector consists of a backflow valve which prevent the backflow of water or biomaterials from the endoscope to the sterile water bottle.

The subject devices are packed in a sealed pouch and are supplied sterile. The subject devices in this submission have the same operation and method of action with the predicate devices.

There were no prior submissions for the subject devices.

7. Intended Use:

The single use ANDORATE® Air/Water Valve is used to control the air / water function of an endoscope during GI endoscopic procedures.

The single use ANDORATE® Suction Valve is used to control the suction function of an endoscope during GI endoscopic procedures.

The single use ANDORATE® Biopsy Valve is used to cover the opening to the biopsy/suction channel of Olympus® gastro-intestinal endoscopes. The Biopsy Valve provides access for endoscopic device passage and exchange, helps maintain insufflation, minimizes leakage of biomaterial from the biopsy port through the endoscopic procedure and provides access for irrigation.

The single use ANDORATE® Auxiliary Water Connector is used in conjunction with irrigation tubing, intended to provide irrigation via irrigation fluids such as sterile water supplied to the Olympus® GI endoscope during gastrointestinal endoscopic procedures when used in conjunction with an irrigation pump. The Auxiliary Water Connector is manufactured with a one-way valve to minimize the risk of cross-contamination of the irrigation system.

8. Technological Characteristics

Table 2 summarizes the valve kit technological characteristics as compared to the predicate devices.

Table 2 – Summary of design, features and principles of operation and technological characteristics between the subject device and predicate devices

Specification	Primary Predicate Device	Secondary Predicate Device	Secondary Predicate Device	Subject Device	Substantial Equivalence
Device Name	Endorate Valve Sets	Andorate Biopsy Valve	Andorate Auxiliary Water Connector	ANDORATE® Valve Kit	N/A
K Number	K181509	K200481	K182998	/	N/A
Product Code	ODC	ODC	OCX	ODC, OCX	Substantial Equivalent
Regulatory Classification	2	2	2	2	Identical
Regulation No	21 CFR 876.1500	21 CFR 876.1500	21 CFR 876.1500	21 CFR 876.1500	Identical
Regulation Description	Endoscope and accessories	Endoscope and accessories	Endoscope and accessories	Endoscope and accessories	Identical
Supplied Sterile	Yes	Yes	Yes	Yes	Identical
Intended Use	The Endorate™ Disposable Suction valve is used to control the suction function of an endoscope during a GI Endoscopic procedure. The Endorate™ Disposable Air/Water valve is used to control the air/water function of an endoscope during a GI Endoscopic procedure. The Endorate™ Disposable biopsy valve is used to cover the endoscope biopsy port during an endoscopy procedure. In addition, the valve provides access for endoscopic device passage and exchange, helps maintain insufflation and minimizes leakage of biomaterial from the biopsy port throughout the endoscopic procedure.	The Andorate® Disposable biopsy valve is used to cover the endoscope biopsy port during an endoscopy procedure. In addition, the valve provides access for endoscopic device passage and exchange, helps maintain insufflation and minimizes leakage of biomaterial from the biopsy port throughout the endoscopic procedure.	The Andorate™ Auxiliary Water Connector is used in conjunction with irrigation tubing (not supplied), intended to provide irrigation via irrigation fluids such as sterile water supplied to the endoscope during gastrointestinal endoscopic procedures when used in conjunction with an irrigation pump.	The single use ANDORATE® Air/Water Valve is used to control the air / water function of an endoscope during GI endoscopic procedures. The single use ANDORATE® Suction Valve is used to control the suction function of an endoscope during GI endoscopic procedures. The single use ANDORATE® Biopsy Valve is used to cover the opening to the biopsy/suction channel of Olympus® gastro-intestinal endoscopes. The Biopsy Valve provides access for endoscopic device passage and exchange, helps maintain insufflation, minimizes leakage of biomaterial from the biopsy port through the endoscopic procedure and provides access for irrigation. The single use ANDORATE® Auxiliary Water Connector is	Substantial Equivalent

Specification	Primary Predicate Device	Secondary Predicate Device	Secondary Predicate Device	Subject Device	Substantial Equivalence
				used in conjunction with irrigation tubing, intended to provide irrigation via irrigation fluids such as sterile water supplied to the Olympus® GI endoscope during gastrointestinal endoscopic procedures when used in conjunction with an irrigation pump. The Auxiliary Water Connector is manufactured with a one-way valve to minimize the risk of cross-contamination of the irrigation system.	
Environment of Use	Hospital and or clinics	Hospital and or clinics	Hospital and or clinics	Hospital and or clinics	Identical
Single Use or Reusable	Single Use	Single Use	Single Use	Single Use	Substantial Equivalent
Material	Acrylonitrile-Butadiene-Styrene Copolymer, Silicone, Stainless steel 304	Silicone	Polycarbonate, silicone	Polycarbonate, Acrylonitrile Butadiene Styrene, Thermoplastic Elastomer, Silicone Rubber, Stainless Steel	Substantial Equivalent
Manufacturing method	Injection moulding	Injection moulding	Injection moulding	Injection moulding	Substantial Equivalent
Packaging	Packaged in a sealed pouch	Packaged in a sealed pouch	Packaged in a sealed pouch	Packaged in a sealed pouch	Substantial Equivalent
Sterilization	EO Gas	EO Gas	EO Gas	EO Gas	Substantial Equivalent

9. Performance Test

The bench testing was performed to support substantial equivalence on both the subject device and the predicate device. The performance data demonstrated that the subject devices met established specifications in the following non-clinical tests such as compatibility test, flow test, leakage, pressing force test and fatigue test for suction valve and compatibility test, flow tests, leakage and pressing force test for air/water valve, vacuum leak and squeegee leak for biopsy valve and endoscope compatibility, air leak, water leak etc. for auxiliary water connector respectively.

10. Biocompatibility

The biocompatibility of the subject devices was conducted in accordance with the FDA guideline “Use of International Standard ISO 10993-1, “Biological evaluation of medical devices – Part 1: Evaluation and testing within a risk management process”. Biocompatibility testing is conducted on subject device in accordance with the ISO 10993 standard. The test result shows that both the subject devices are biocompatible.

11. Conclusion

The subject devices have the same intended use as the predicate devices. Based on the technological characteristics and overall performance of the devices in bench testing, there are no significant differences exist between the subject devices and the predicate devices. The subject devices do not raise any new issues of safety and effectiveness. From a clinical perspective and comparing design specifications, the subject devices and the predicate device are substantially equivalent.